

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

L. LIN WOOD, JR.,

Plaintiff,

v.

CASE NO. 1:21-CV-1169-TCB

PAULA J. FREDERICK, et. al.,

Defendants.

_____/

PLAINTIFF'S MOTION TO CONTINUE MAY 13, 2021 HEARING

COMES NOW the Plaintiff, L. LIN WOOD, JR., by and through undersigned counsel, pursuant to LR 7.1 and files this motion to continue the hearing scheduled to take place on Thursday, May 13, at 10:00 a.m. in Courtroom 2106 of the United States Courthouse, in Atlanta, Georgia, and in support of this request states the following:

On May 3, 2021, this court entered an Order scheduling the aforementioned hearing. On May 6, 2021, the court entered an Order denying Plaintiff's request to reconsider the court's May 3, 2021 scheduling Order and specifically noted that the purpose of the expedited schedule was to accommodate Plaintiff Wood's desire to move the case expeditiously and try to issue a ruling before the State Bar of Georgia's May, 14 meeting.

First and foremost, Plaintiff wishes to apprise the Court that the State Bar of Georgia has agreed to postpone the May 14th meeting, thus the need for an expedited accommodation is not necessary. Additionally, while Plaintiff has timely complied with the expedited briefing schedule set by the Court, Plaintiff Wood has an unavoidable scheduling conflict and is unavailable to appear in Atlanta, Georgia on May 13, 2021, and consequently is requesting that this Court continue the hearing in this matter.

Moreover, Plaintiff's co-counsel, Ibrahim Reyes, Esquire was notified yesterday, May 9, 2021, that he had tested positive for the COVID-19 virus, and he too is now unavailable. (See Mr. Reyes' Lab Results attached hereto as Exhibit A).

This motion is filed in good faith and not for purposes of delay, as evidenced by Plaintiff's affidavit attached hereto as Exhibit B.

Undersigned counsel has conferred with Defendants' counsel, who indicated that they would take no position on Plaintiff's request for a continuance, and simply defer to the Court.

WHEREFORE, the Plaintiff respectfully requests that this Court grant his motion and enter an Order continuing the hearing scheduled for May 13, 2021.

Respectfully submitted,

Crain Law Group, PLLC

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Counsel, Pro Se

CERTIFICATE OF COMPLIANCE

I CERTIFY that this document has been prepared in compliance with Local Rule 5.1C using 14-point Times New Roman font.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of May 2021, the above motion was filed with the Court's electronic filing system that will provide notice to all parties.

By: /s/ Larry Crain